

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*  
Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,  
Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**STIPULATION AND ~~PROPOSED~~ ORDER<sup>1</sup>**

This Stipulation and Agreement, dated August [8<sup>th</sup>], 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

<sup>1</sup> Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.


WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Player Mohamed Massaquoi (ECF No. 6533);

WHEREAS, Mohamed Massaquoi has since submitted a written request seeking to revoke his Opt Out request (*see* Exhibit 1 (Declaration of Orran L. Brown, Sr.));

WHEREAS, the Parties have agreed to accept the revocation request submitted by Mohamed Massaquoi, subject to Court approval, because he submitted the request before the deadline to register for the Class Action Settlement program;

**AND NOW**, this [8<sup>th</sup>] day of August, 2017, it is hereby stipulated and agreed by the Parties that the revocation request submitted by Mohamed Massaquoi is accepted, subject to Court approval, because he submitted the request before the deadline to register for the Class Action Settlement program.

It is so **STIPULATED AND AGREED**,

By:  By: Brad S. Karp PR  
Date: August 8, 2017 Date: August 8, 2017

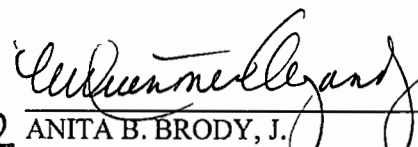
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*Class Counsel*

*Counsel for the NFL Parties*

It is so **ORDERED**, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation request submitted by Mohamed Massaquoi is approved and the Claims Administrator is **DIRECTED** to post a revised list of Opt Outs forthwith excluding Mohamed Massaquoi.

*For*  *as EMERGENCY JUDGE*  
ANITA B. BRODY, J.  
*NITZA I. Quintones Alejandro*

Copies **VIA ECF** on \_\_\_\_\_ to:

Copies **MAILED** on \_\_\_\_\_ to:

# EXHIBIT 1

5. Section 14.2(c) of the Settlement Agreement provides that a Class Member who had Opted Out but wished to revoke that Opt Out could submit a written request to do

so “[p]rior to the Final Approval Date.” At various times after the April 22, 2015 Final Approval Date, 82 people who had Opted Out submitted requests to revoke their Opt Outs. The Parties to the Settlement Agreement agreed to accept those revocation requests, subject to Court approval, and reported the requests to the Court. By Orders of July 15, 2015 (Document 6642), December 22, 2015 (Document 6713), January 26, 2016 (Document 6739), September 15, 2016 (Document 6907), October 25, 2016 (Document 6924), November 8, 2016 (Document 6937), December 21, 2016 (Document 7033), January 18, 2017 (Document 7084), January 20, 2017 (Document 7097), February 6, 2017 (Document 7119), March 9, 2017 (Document 7264), March 20, 2017 (Document 7297), March 28, 2017 (Document 7374), April 11, 2017 (Document 7471), April 13, 2017 (Document 7478), April 24, 2017 (Document 7547), May 2, 2017 (Document 7594), May 18, 2017 (Document 7674), May 25, 2017 (Documents 7763 and 7764), June 26, 2017 (Document 7848), July 17, 2017 (Document 8023), July 18, 2017 (Document 8033), July 19, 2017 (Document 8038), July 25, 2017 (Document 8076), July 27, 2017 (Document 8159), July 28, 2017 (Document 8191), August 1, 2017 (Document 8199), August 3, 2017 (Document 8208), August 4, 2017 (Document 8218), and August 7, 2017 (Document 8224) the Court approved 76 of the 82 revocations. Six recent revocation requests are pending before the Court (Documents 8215 and 8230). Each time the Court approved a revocation, we no longer counted that person as an Opt Out and posted on the Settlement website a revised list of Timely Opt Out Requests Containing All Information Required by Section 14.2(a) or Otherwise Approved by the Court (the “Timely Opt Out List”) to reflect the results of the Orders. That Timely Opt Out List now contains 105 names, including six persons whose Opt Outs the Court directed be added to

that list in its Orders of September 8, 2016 (Document 6902) and March 6, 2017 (Document 7244).

6. On August 7, 2017, we received an Opt Out revocation request from Mr. Mohamed Massaquoi, who is on the Timely Opt Out List. Mr. Massaquoi registered timely for Settlement benefits. I have attached to this Declaration a copy of his request with his personal information redacted. The Parties to the Settlement Agreement have agreed to accept his revocation, subject to Court approval. If the Court grants its approval, we no longer will count Mr. Massaquoi as an Opt Out and, upon the Court's direction, we will post a revised Timely Opt Out List on the Settlement website.

I, Orran L. Brown, Sr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 8<sup>th</sup> day of August, 2017.

A handwritten signature in black ink, appearing to read "Orran L. Brown, Sr.", is written over a horizontal line.

Orran L. Brown, Sr.

**NFL****CONCUSSION SETTLEMENT**IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION  
No. 2:12-md-02323 (E.D. Pa.)**REQUEST TO REVOKE OPT OUT FROM SETTLEMENT CLASS**

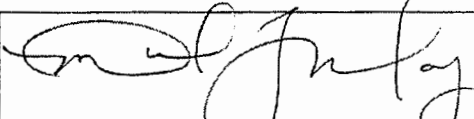
A person who Opted Out of the NFL Concussion Settlement may request to revoke that Opt Out by completing this form and sending it to the Claims Administrator. The Claims Administrator will present the request to the Parties to the Settlement Agreement for their consideration. If Co-Lead Class Counsel and the NFL Parties both consent, they will submit it to the Court for approval. Complete all sections of this form. If your revocation is approved, you cannot later Opt Out again.

**I. PERSON SEEKING TO REVOKE OPT OUT**

<b>Name</b>	First <u>Mohamed</u>	M.I. <u>S</u>	Last <u>Massagou</u>
<b>Mailing Address</b>	Address 1		
	Address 2		
	City	State	Zip
<b>Telephone Number</b>	<u>1</u>		
<b>Date of Birth</b>	<u>1</u> (Month/Day/Year)		
<b>Settlement Class Member Type</b>	<input checked="" type="checkbox"/> I am a Retired NFL Football Player. <input type="checkbox"/> I am a Representative Claimant. I have a legal right to act on behalf of a Retired NFL Football Player. <input type="checkbox"/> I am a Derivative Claimant. I have certain legal rights because of my relationship with a Retired NFL Football Player.		

**II. STATEMENT OF INTENT AND SIGNATURE**

I wish to revoke my Opt Out from the Settlement Class and instead be included in the Settlement Class.

<b>Signature</b>		<b>Date</b>	<u>10/8/17</u> (Month/Day/Year)
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**III. HOW TO SUBMIT THIS FORM**

<b>By Email:</b>	ClaimsAdministrator@NFLConcussionSettlement.com
<b>By Mail:</b>	NFL Concussion Settlement Claims Administrator P.O. Box 25369 Richmond, VA 23260
<b>By Online Portal:</b>	Go to your secure online portal with the Claims Administrator and upload this signed PDF.



**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing document was served electronically via the Court's electronic filing system on the 8th day of August, 2017, upon all counsel of record.

Dated: August 8, 2017

/s/ Brad S. Karp  
Brad S. Karp